

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

M.P. and T. L., as individuals and
as parents of and on behalf of
their minor child, **G.L.**,

Plaintiffs,

Case No. _____

v.

**MILWAUKEE BOARD OF SCHOOL
DIRECTORS and KASONGO
KALUMBULA**,

Defendants.

MOTION FOR PROTECTIVE ORDER TO REDACT PLAINTIFFS' NAMES

Plaintiffs M.P. and T.L., as individuals and on behalf of their minor child G.L.,
hereby move the court to permit redaction of the minor plaintiffs name and his
parents' names for the reasons here set forth:

1. Plaintiff G.L. is a minor. Pursuant to Fed. R. Civ. P. 5.2(a), he may only be referred to by his initials in this matter.
2. Plaintiffs M.P. and T.L. are G.L.'s parents, and if their last names are revealed in public filings it will defeat the purpose of the redaction requirement of Fed. R. Civ. P. 5.2(a).
3. To keep the Court and Defendants fully apprised of the content of all pleadings, plaintiffs have filed a redacted version of the pleadings which is

available to the public, and an unredacted version which is available only to the court and parties, thereby ensuring compliance with with Fed. R. Civ. P. 5.2(a).

Wherefore, to ensure clarity for the court and parties while also protecting G.L.'s privacy, Plaintiffs move the court for a protective order requiring all parties to file two copies of all pleadings and documents going forward in this case: one publicly available copy which redacts Plaintiff's names and identifies Plaintiffs' by their initials; and one copy available only to the Court and Parties which identifies Plaintiffs by name.

Respectfully Submitted this 22nd day of March, 2024.

/s/ Elisabeth Lambert

Attorney For Plaintiffs

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